

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION

SOUTHERN FARM BUREAU LIFE INSURANCE COMPANY

PLAINTIFF

V.

CASE NO. 4:21-CV-00219-BSM

T.J. JEFFERS and EMILY SANDERLIN

DEFENDANTS

ANSWER

Comes the Separate Defendant, T.J. Jeffers, by and through his attorneys, Phillip Allen and Joe Perry, and for his answer, states:

1. That the Separate Defendant, T.J. Jeffers, admits the allegations in Paragraph 1 of the Complaint.

2. That the Separate Defendant, T.J. Jeffers, admits the allegations in Paragraph 2 of the Complaint.

3. For lack of knowledge, the Separate Defendant, T.J. Jeffers, denies the allegations in Paragraph 3 of the Complaint.

4. That the Separate Defendant, T.J. Jeffers, admits the allegations in Paragraph 4 of the Complaint.

5. That the Separate Defendant, T.J. Jeffers, denies the allegations in Paragraph 5 of the Complaint.

6. That the Separate Defendant, T.J. Jeffers, admits the allegations in Paragraph 6 of the Complaint.

7. That the Separate Defendant, T.J. Jeffers, denies the allegations in Paragraph 7 of the Complaint.

8. That the Separate Defendant, T.J. Jeffers, denies the allegations in Paragraph 8 of the Complaint.

9. That the Separate Defendant, T.J. Jeffers, denies the allegations in Paragraph 9 of the Complaint.

10. That the Separate Defendant, T.J. Jeffers, denies the allegations in Paragraph 10 of the Complaint.

11. That the Separate Defendant, T.J. Jeffers, admits the allegations in Paragraph 11 of the Complaint.

12. For lack of knowledge, the Separate Defendant, T.J. Jeffers, denies the allegations in Paragraph 12 of the Complaint.

13. For lack of knowledge, the Separate Defendant, T.J. Jeffers, denies the allegations in Paragraph 13 of the Complaint.

14. For lack of knowledge, the Separate Defendant, T.J. Jeffers, denies the allegations in Paragraph 14 of the Complaint.

15. For lack of knowledge, the Separate Defendant, T.J. Jeffers, denies the allegations in Paragraph 15 of the Complaint.

16. For lack of knowledge, the Separate Defendant, T.J. Jeffers, denies the allegations in Paragraph 16 of the Complaint.

17. For lack of knowledge, the Separate Defendant, T.J. Jeffers, denies the allegations in Paragraph 17 of the Complaint.

18. That the Separate Defendant, T.J. Jeffers, admits the allegations in Paragraph 18 of the Complaint.

19. For lack of knowledge, the Separate Defendant, T.J. Jeffers, denies the allegations in Paragraph 19 of the Complaint.

20. That the Separate Defendant, T.J. Jeffers, admits the allegations in Paragraph 20 of the Complaint.

21. That the Separate Defendant, T.J. Jeffers, admits the allegations in Paragraph 21 of the Complaint.

22. That the Separate Defendant, T.J. Jeffers, admits the

allegations in Paragraph 22 of the Complaint.

23. That the Separate Defendant, T.J. Jeffers, admits the allegations in Paragraph 23 of the Complaint.

24. That the Separate Defendant, T.J. Jeffers, admits the allegations in Paragraph 24 of the Complaint.

25. That the Separate Defendant, T.J. Jeffers, admits the allegations in Paragraph 25 of the Complaint.

WHEREFORE, HAVING FULLY ANSWERED, the Separate Defendant, T.J. Jeffers, prays that the Complaint filed herein by the Plaintiff be dismissed; for attorney's fees and costs, and for all other proper relief to which he may be entitled.

Respectfully Submitted,

BY: _____

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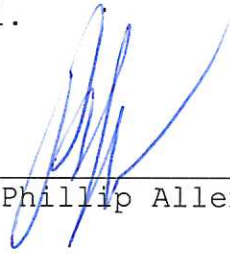
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CERTIFICATE OF SERVICE

I, Phillip Allen, attorney for the Separate Defendant, T.J. Jeffers, hereby certify that a copy of the above Answer has been served upon the Attorney for the Plaintiff,

Mr. David M. Donovan
Attorney at Law
Watts, Donovan, Tilley & Carson, P.A.
2120 Riverfront Dr., Ste. 275
Little Rock, AR 72202

on this 10th day of May, 2021.



Phillip Allen